

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF MINNESOTA**  
*Criminal No.: 21-cr-108 (PAM/TNL)*

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UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
vs.	)	
	)	
DEREK MICHAEL CHAUVIN,	)	
	)	
Defendant.	)	
	)	
	)	

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**DEFENDANT’S PRETRIAL MOTION  
FOR DISCLOSURE OF GRAND JURY  
MINUTES AND TRANSCRIPT**

Derek Michael Chauvin, through his undersigned attorney, Eric J. Nelson, Halberg Criminal Defense, moves the Court for an Order directing the Government to disclose the minutes and transcripts of the grand jury which returned the indictment on the grounds that:

1. The indictment may be based upon evidence illegally obtained;
2. The transcript is necessary to reveal whether grounds exist to support a motion to dismiss the Indictment due to procedural issues occurring within the grand jury proceedings;
3. The evidence presented is essential for the purposes of impeaching the witnesses, to refresh witness recollection, and to assess witness credibility.

This motion is based upon the files and records in this case, the Indictment, the Federal Statutes, the Federal Rules of Criminal Procedure, the United States and Minnesota Constitutions and upon such other and further points and authorities as may subsequently be presented to the Court.

Respectfully submitted,

**HALBERG CRIMINAL DEFENSE**

Dated: August 3, 2021

/s/ Eric J. Nelson

Eric J. Nelson

Attorney No. 308808

Attorney for Defendant

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